

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-001

Complaint of the :
Greeting Card Association : Docket No. C2020-2

GREETING CARD ASSOCIATION MOTION FOR
ISSUANCE OF AN INFORMATION REQUEST

In the *Response of the Greeting Card Association to Postal Service Answers to Chairman's Information Request No. 1*, filed on April 10, 2020, the Greeting Card Association (GCA) identified certain areas as to which information presumably available to the Postal Service would usefully be made the subject of a further Information Request. GCA now formally moves for issuance of such a request.

The proposed questions which follow track the suggestions made in the April 10 *Response*.

Proposed questions to the Postal Service

"In responding to each question, please provide data for the most recent Fiscal Year available; and if the answer is an estimate rather than a booked quantity, please so indicate and describe how the estimate was made.

"1. Please provide a breakdown of (i) stamp production and (ii) stamp distribution costs among –

- (a) Precanceled stamps;
- (b) Stamps utilized in the philatelic program;
- (c) Migratory bird stamps;

- (d) International reply coupons;
- (e) Other products (whether stamps or non-stamp items) listed in the definition of account 5244100; and
- (f) Non-precanceled adhesive stamps intended for the mailing by customers of letters and other mail.
- (g) If there are items accounted for as stamp production and distribution which are not named in subsections (a) – (f) of this question, please identify any such additional item(s) and provide the cost of each of such item(s).

"2. (a) Please identify any products, programs, or cost centers representing costs wholly or predominantly associated with metered mail, including but not limited to management and accounting required by customers' meter accounts; and

(b) Please provide the cost of each such product, program, or cost center."

GCA believes that, as stated in our April 10 *Response*, the information sought by the proposed questions is necessary and appropriate to arrive at a comprehensive and balanced view of the relative costs of Stamped and Metered First-Class Single-Piece Letters. We consider such a balanced view of relative cost essential to at least one fundamental aspect of a decision on the present complaint.

April 21, 2020

Respectfully submitted,

GREETING CARD ASSOCIATION

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Certificate of Service

I certify that I have today served the foregoing document, via the Postal Regulatory Commission Filing On Line system and by electronic mail, in a true and correct copy, upon:

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April 21, 2020

David F. Stover